MOTION GRANTED.

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

JOHNNY M. HUNT,

Case No. 3:23-cv-00243

Plaintiff,

Judge Richardson Magistrate Judge Frensley

v.

SOUTHERN BAPTIST CONVENTION; GUIDEPOST SOLUTIONS LLC; and EXECUTIVE COMMITTEE OF THE SOUTHERN BAPTIST CONVENTION.

Defendants.

#### UNOPPOSED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26, Defendant, Guidepost Solutions, LLC, moves this Court for entry of an Agreed Protective Order, a copy of which is attached as **Exhibit 1**. This motion is unopposed.

The parties have agreed to the language and content of the proposed Agreed Protective Order and believe its entry is necessary for purposes of facilitating discovery while at the same time protecting certain information and documents that may be produced during the discovery process that the parties believe in good faith are sensitive, confidential, proprietary, and/or personal. The proposed Agreed Protective Order submitted for the Court's consideration should minimize this Court's involvement in adjudicating disputes among the parties arising from the production of such information.

Defendant, Guidepost Solutions, LLC, respectfully requests the Court enter the proposed Agreed Protective Order.

# Respectfully submitted,

## s/John R. Jacobson

John R. Jacobson, Esq. (BPR # 014365) Katharine R. Klein, Esq. (BPR # 019336) 1906 West End Avenue Nashville, TN 37203 Telephone: (615) 320-3700 jjacobson@rjfirm.com kklein@rjfirm.com

-and-

### MINTZ & GOLD LLP

Steven G. Mintz (admitted pro hac vice) Terence W. McCormick (admitted pro hac vice) 600 Third Avenue 25<sup>th</sup> Floor New York, NY 10016 Telephone: (212) 696-4848 mintz@mintzandgold.com mccormick@mintzandgold.com

Counsel for Guidepost Solutions LLC

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served through the Court's electronic filing system on the following:

Todd G. Cole, Esq. Andrew Goldstein, Esq. COLE LAW GROUP, P.C. 1648 Westgate Circle, Suite 301 Brentwood, TN 37027 Telephone: (615) 326-9059 tcole@colelawgrouppc.com agoldstein@colelawgrouppc.com

Robert D. MacGill, Esq.

Scott E. Murray, Esq. Patrick J. Sanders, Esq. **MACGILL PC** 156 E. Market St. **Suite 1200** Indianapolis, IN 46204 Telephone: (317) 721-1253 robert.macgill@macgilllaw.com scott.murray@macgilllaw.com patrick.sanders@macgilllaw.com

Counsel for Plaintiff

Gene Ross Besen BRADLEY ARANT BOULT CUMMINGS LLP 1445 Ross Avenue **Suite 3600** Dallas, TX 75202 Telephone: (214) 257-9758 gbesen@bradley.com

Counsel for the Executive Committee of the Southern Baptist Convention

on this 24th day of July, 2023.

L. Gino Marchetti, Jr., Esq. Matt C. Pietsch, Esq. TAYLOR, PIGUE, MARCHETTI & BLAIR, **PLLC** 2908 Poston Avenue Nashville, TN 37203 Telephone: (615) 320-3225 gmarchetti@tpmblaw.com matt@tpmblaw.com

Counsel for the Southern Baptist Convention

Scarlett Singleton Nokes, Esq. R. Brandon Bundren, Esq. BRADLEY ARANT BOULT CUMMINGS LLP 1600 Division Street, Suite 700 Nashville, Tennessee 37203 Telephone: (615) 244-2582 snokes@bradley.com bbundren@bradley.com

Counsel for the Executive Committee of the Southern Baptist Convention

/T 1 D	T 1	
s/John K.	Jacobson	